

EXHIBIT “A”

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

CLEOPATRA DE LEON, NICOLE
DIMETMAN, VICTOR HOLMES, and
MARK PHARISS,
Plaintiffs,

v.

GREG ABBOTT, in his official capacity as Governor of the State of Texas, KEN PAXTON, in his official capacity as Texas Attorney General, GERARD RICKHOFF, in his official capacity as Bexar County Clerk, and KIRK COLE, in his official capacity as interim Commissioner of the Texas Department of State Health Services
Defendants.

CIVIL ACTION NO.
5:13-CV-982-OLG

DECLARATION OF BRANTLEY STARR

My name is Brantley Starr and I am over the age of 18 and fully competent to make this declaration and state the following:

1. I am the Deputy Attorney General for Legal Counsel at the Office of the Attorney General. I have held this position since January 2015. Previously, I served the Office of the Attorney General as an Assistant Solicitor General in 2006–08 and an Assistant Attorney General in 2004–05.

2. As Deputy Attorney General for Legal Counsel, part of my job duties involve consultation with agencies on complex legal matters that are currently in or about to be in litigation.
3. I have factual knowledge superior to anyone at the Office of the Attorney General regarding the impact of *Obergefell* on forms and applications of the Department of State Health Services.
4. I coordinated internal meetings at the Office of the Attorney General with lawyers from a variety of divisions to analyze the legal arguments for changes to the forms and applications.
5. I also was the primary point of contact at the Office of the Attorney General for discussions with the Department of State Health Services. All of these communications were privileged.
6. I am aware of the Court's August 5 order setting a hearing on August 12 for the Interim Commissioner of the Department of State Health Services and the Attorney General regarding the issuance of death certificates amendments to reflect same-sex spouses for death certificates that pre-dated *Obergefell*.
7. The topics likely to be addressed at that hearing should be more within the scope of my knowledge than that of anyone else at the Office of the Attorney General, including the Attorney General.
8. I possess the information that would be the subject of the August 12 hearing that the Attorney General possesses.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of August, 2015.



Brantley Starr